

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**RAYMOND L. BROOKS, III, INDIVIDUALLY §
AND AS REPRESENTATIVE OF THE §
ESTATE OF ROBERT BROOKS, §
DECEASED, GERALDINE BROOKS, §
NA'TOSHA ROBINSON, ASHLEY §
JOHNSON, CRYSTAL BROOKS, §
TIARA BROOKS, CIARA BROOKS §
AND ROBINEISHA BROOKS AND §
BRIANNA BROOKS, MICHAEL §
BROOKS, AND ARLENE BROOKS §
Plaintiffs, §**

V. §

**HARRIS COUNTY SHERIFF'S §
DEPARTMENT, UNKNOWN DEPUTIES §
AS AGENTS, INDIVIDUALLY AND AS §
EMPLOYEES OF HARRIS COUNTY §
AND HARRIS COUNTY SHERIFF'S §
DEPARTMENT, AND SHERIFF RON §
HICKMAN, INDIVIDUALLY AND IN THE §
OFFICIAL CAPACITY AS HARRIS COUNTY §
SHERIFF §
Defendants. §**

**CIVIL ACTION NO.
4:17-CV-_____**

JURY DEMAND

INDEX OF MATTERS FILED UPON REMOVAL

The following documents appear in the file of the case styled *Raymond L. Brooks, III, individually and as representative of the Estate of Robert Brooks, Deceased, Geraldine Brooks, Na'tosha Robinson, Ashley Johnson, Crystal Brooks, Tiara Brooks, Ciara Brooks and Robineisha Brooks and Brianna Brooks, Michael Brooks, and Arlene Brooks v. Harris County Sheriff's Department, Unknown Deputies as agents, individually and as employees of Harris County and Harris County Sheriff's Department, and Sheriff Ron Hickman, individually and in the official capacity as Harris County Sheriff*, Cause No. 2017-39278, in the 165th Judicial District Court of Harris County, Texas, certified copies of which are attached:

1. Plaintiffs' Original Petition;
2. Civil Case Information Sheet;
3. Filing Letter/Additional fees;
4. Civil Process Pick-Up Form;
5. Executed Citation on Harris County Sheriff's Department.

Respectfully submitted,

OF COUNSEL:

VINCE RYAN
HARRIS COUNTY ATTORNEY

/S/ Mary E. Baker

MARY E. BAKER

Senior Assistant County Attorney

Federal I.D. No. 7647

State Bar No. 08534000

SETH B. HOPKINS

Assistant County Attorney

Federal I.D. No. 2043155

State Bar No. 24032435

1019 Congress, 15th Floor

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Email: mary.baker@cao.hctx.net

Email: seth.hopkins@cao.hctx.net

ATTORNEYS FOR DEFENDANT

HARRIS COUNTY SHERIFF'S DEPARTMENT

CERTIFICATE OF SERVICE

I hereby certify that on July 18, 2017, a true and correct copy of this pleading was served upon all parties of record certified mail and/or via CM/ECF system to:

Lanease D. Fuller
Law Office of Lanease D. Fuller
4651 Southwest Freeway, Suite 820
Houston, Texas 77027
Telephone: (713) 439-7400
Facsimile: (713) 439-7471
Email: attyfuller@gmail.com

/S/ Mary E. Baker

MARY E. BAKER

Senior Assistant County Attorney

HCDistrictclerk.com

BROOKS, RAYMOND L (III) (INDIVIDUALLY AN vs.
HARRIS COUNTY SHERIFF'S DEPARTMENT
Cause: 201739278 CDI: 7 Court: 165

7/18/2017

DOCUMENTS

Number	Document	Post Jdgm	Date	Pgs
restricted	Citation		07/05/2017	2
restricted	Civil Process Pick-Up Form		06/21/2017	1
restricted	Filing Letter/ Additional Fees		06/13/2017	2
restricted	Plaintiffs' Original Petition Request For Disclosure And Request For Jury Trial		06/12/2017	11
-> restricted	Civil Case Information Sheet		06/12/2017	2

CAUSE NO. _____

RAYMOND L BROOKS, III, INDIVIDUALLY	§	IN THE DISTRICT COURT
AND AS REPRESENTATIVE OF THE	§	
ESTATE OF ROBERT BROOKS,	§	
DECEASED, GERALDINE BROOKS,	§	
NA'TOSHA ROBINSON, ASHLEY	§	
JOHNSON, CRYSTAL BROOKS,	§	
TIARA BROOKS, CIARA BROOKS	§	
AND ROBNEISHA BROOKS AND	§	
BRIANNA BROOKS, MICHAEL	§	
BROOKS, AND ARLENE BROOKS	§	
	§	
Plaintiffs,	§	
	§	
vs.	§	_____ JUDICIAL DISTRICT
	§	
HARRIS COUNTY SHERIFF'S	§	
DEPARTMENT, UNKNOWN DEPUTIES	§	
AS AGENTS, INDIVIDUALLY AND AS	§	
EMPLOYEES OF HARRIS COUNTY	§	
AND HARRIS COUNTY SHERIFF'S	§	
DEPARTMENT, AND SHERIFF RON	§	
HICKMAN, INDIVIDUALLY AND IN THE	§	
OFFICIAL CAPACITY AS HARRIS COUNTY	§	
SHERIFF	§	
	§	
Defendants.	§	HARRIS COUNTY, TEXAS

PLAINTIFFS' ORIGINAL PETITION
REQUEST FOR DISCLOSURE AND REQUEST FOR JURY TRIAL

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES RAYMOND L. BROOKS, III, INDIVIDUALLY AND AS REPRESENTATIVE OF THE ESTATE OF ROBERT BROOKS, DECEASED, GERALDINE BROOKS, NA'TOSHA ROBINSON, ASHLEY JOHNSON, CRYSTAL BROOKS, TIARA BROOKS, CIARA BROOKS, ROBNEISHA BROOKS, BRIANNA BROOKS, MICHAEL

BROOKS, AND ARLENE BROOKS hereinafter called Plaintiffs, and for cause of action would show unto the Court the following:

I.

DISCOVERY CONTROL PLAN AND REQUEST FOR DISCLOSURE

1. Plaintiff intends that discovery be conducted under Discovery Level 3.
2. Pursuant to Rule 194 of the Texas Rules of Civil Procedure, Defendants are requested to disclose, within fifty (50) days of service of this request, the information or material described in Rule 194.2(a-1).

II.

PARTIES AND SERVICES

3. Plaintiff Raymond Brooks is a person of the full age of majority and a resident of Harris County Texas. Raymond Brooks sues on behalf of himself and as the personal representative of the Estate of Robert Brooks, deceased.
4. Plaintiff Geraldine Brooks is the mother Mr. Robert Brooks.
5. Plaintiff Na'Tosha Robinson is the daughter of Mr. Robert Brooks.
6. Plaintiff Ashley Johnson is the daughter of Mr. Robert Brooks.
7. Plaintiff Crystal Brooks is the daughter of Mr. Robert Brooks.
8. Plaintiff Tiara Brooks is the daughter of Mr. Robert Brooks.
9. Ciara Brooks is the daughter of Mr. Robert Brooks.
10. Robneisha Brooks is the daughter of Mr. Robert Brooks.
11. Brianna Brooks is the daughter of Mr. Robert Brooks.
12. Michael Brooks is the brother of Mr. Robert Brooks.

13. Arlene Brooks is the sister of Mr. Robert Brooks.

14. Defendant Harris County Sheriff's Department is a Texas County and may be served by and through its county judge, the Honorable Ed Emmett, 1001 Preston, Suite 911, Houston, Harris County, Texas 77002.

15. Defendants "John Doe" as unnamed guards, detention officers and other contract workers and medical staff of Harris County Jail and employees of the Harris County Sheriff's Department and can be served by and through the county judge, the Honorable Ed Emmett, 1001 Preston, Suite 911, Houston, Harris County, Texas 77002.

16. Defendant Ron Hickman in his capacity as Sheriff can be served at the Harris County Sheriff's Office, 1200 Baker Street, Houston, Texas 77002.

III.

JURISDICTION & VENUE

17. Venue is proper in this Court because all relevant acts and omissions giving rise to Plaintiffs' claims occurred in Harris County, Texas and because Defendants are all located or may be found in Harris County, Texas and because Defendants are all located or may be found in Harris County.

IV.

FACTS

18. This is a civil rights action brought by the Plaintiffs against Defendants Harris County Sheriff's Department, by and through its agents and servants for their alleged wrongful conduct in the death of Robert Brooks.

19. Plaintiffs allege that Harris County Sheriff's Department failed to assess the inmates for their risk to other inmates.

20. Plaintiffs allege that the Harris County Sheriff's Department failed to properly train, supervise, and routinely monitor the inmates on a regular basis which is required by state law.

21. Plaintiffs allege the Harris County Sheriff's Department failed to keep the inmates safe while in the care, control and custody of the Harris County jail.

22. Plaintiffs allege that the Harris County Sheriff's Department failed to timely and adequately notify his family of a jail assault and blunt head trauma experienced by Mr. Brooks.

23. Plaintiffs allege Mr. Brooks was in the hospital nine (9) days and the decision to discontinue life support measures was made on day nine (9) by the Neurology team.

24. Plaintiffs would further show that the Defendants actions were the result of unwarranted acts, lack of training and the official violation of policies and procedures of the Harris County Sheriff's Department which resulted in the untimely death of Robert Brooks.

V.

FACTUAL BACKGROUND

25. On June 4, 2015, while in the custody of Harris County Sheriff's Department, Mr. Brooks was admitted to St. Joseph's Hospital with bilateral subdural hematoma.

26. According to an investigation by the medical examiner's office, Mr. Brooks was involved in an altercation at the Harris County Sheriff's Detention Center where it is alleged that he was assaulted by another inmate. Mr. Brooks was struck while in custody with such force it caused him to fall backwards striking his head.

27. It has been reported that Robert Brooks was non responsive in his jail cell for several hours. After a period of time, he was transported from the jail to St. Joseph's Emergency Room and Hospital with "complications of blunt head trauma."

28. Mr. Brooks was taken to the operating room for evacuation and remained encephalopathic, comatose on vent support.
29. Towards the end of his hospital stay, Mr. Brooks showed no improvement, remained comatose. Neurological recovery was deemed very slim.
30. The decision was made with all physicians involved to withdraw life support after no family member was contacted.
31. The Harris County Sheriff's Department never attempted to contact the family although they had contact information for the family since they went to the family residence to arrest Mr. Brooks.
32. All Harris County Officers, John Doe" as unnamed guards, detention officers and other contract workers and medical staff of Harris County Jail and employees of the Harris County Sheriff's Department are yet to be identified.
33. On June 12, 2015, Mr. Brooks was withdrawn from life support and passed away on that day.

VI.

NEGLIGENCE OF HARRIS COUNTY SHERIFF'S DEPARTMENT

34. The negligent and careless disregard of duty of the Harris County Sheriff's Department consisted of, but is not limited to, the following acts and omissions:
35. Defendant Harris County Sheriff's Department had a duty properly train, supervise, screen, discipline, transfer, counsel or otherwise control officers.
36. Plaintiff would further show that Harris County Sheriff's Department knew or should have known but never provided the requisite and proper training.

37. Defendant Harris County Sheriff's Department never notified the family that Mr. Brooks had been injured while in their care, custody and control.

38. Defendant Harris County Sheriff's Department never notified the family that Mr. Brooks was in the hospital, in a coma and had emergency surgery.

39. Defendant Harris County Sheriff's Department never notified the family that Mr. Brooks passed away from his injuries.

VII.

NEGLIGENCE OF UNKNOWN HARRIS COUNTY DEPUTIES UNDER

40. The negligent and careless disregard of duty of the Harris County Deputies consisted of, but is not limited to, the following acts and omissions:

41. Defendant Harris County Deputies were not properly trained, supervised, screened, disciplined, transferred, counseled or otherwise controlled.

42. Plaintiff would further show that Harris County Deputies knew or should have known but were never provided the requisite and proper training.

43. Defendant Harris County Deputies never notified the family that Mr. Brooks had been injured while in their care, custody and control.

44. Defendant Harris County Sheriff's Department never notified the family that Mr. Brooks was in the hospital, in a coma and had emergency surgery.

45. Defendants demonstrated deliberate indifference to the severe medical needs of Robert Brooks.

VIII.

NEGLIGENCE OF HARRIS COUNTY SHERIFF RON HICKMAN

46. The negligent and careless disregard of duty of Harris County Sheriff Ron Hickman consisted of, but is not limited to, the following acts and omissions:

47. Defendant Harris County Sheriff's Department had a duty properly train, supervise, screen, discipline, transfer, counsel or otherwise control officers.

48. Plaintiff would further show that Harris County Sheriff's Department knew or should have known but never provided the requisite and proper training.

49. Defendant Harris County Sheriff's Department never notified the family that Mr. Brooks had been injured while in their care, custody and control.

50. Defendant Harris County Sheriff's Department never notified the family that Mr. Brooks was in the hospital, in a coma and had emergency surgery.

51. Defendant Harris County Sheriff's Department never notified the family that Mr. Brooks passed away from his injuries.

IX.

CAUSES OF ACTION

52. This is a cause of action brought by RAYMOND L. BROOKS, III, INDIVIDUALLY AND AS REPRESENTATIVE OF THE ESTATE OF ROBERT BROOKS, DECEASED, GERALDINE BROOKS, NA'TOSHA ROBINSON, ASHLEY JOHNSON, CRYSTAL BROOKS, TIARA BROOKS, CIARA BROOKS, ROBNEISHA BROOKS, BRIANNA BROOKS, MICHAEL BROOKS, AND ARLENE BROOKS hereinafter called Plaintiffs against Defendants HARRIS COUNTY SHERIFF'S DEPARTMENT, UNKNOWN DEPUTIES AS AGENTS, INDIVIDUALLY AND AS EMPLOYEES OF HARRIS COUNTY AND

HARRIS COUNTY SHERIFF'S DEPARTMENT, AND SHERIFF RON HICKMAN,
INDIVIDUALLY AND IN THE OFFICIAL CAPACITY AS HARRIS COUNTY SHERIFF

for their negligence resulting in the untimely death of Robert Brooks pursuant to Civil Practice and Remedies Code Chapter 71 § 71.002 and in violation of his individual rights under the Fourth Amendment of the United States Constitution and in violation of his civil rights pursuant to 42 U.S.C. § 1983.

X.

SURVIVAL ACTION

- 53. Plaintiffs incorporate by reference paragraphs 1 through 49 as if fully set forth herein.
- 54. Plaintiff Raymond Brooks is the Representative for the Estate of Robert Brooks.
- 55. Brooks died as a result of the Defendants' wrongful conduct.
- 56. Brooks would have been entitled to bring this action against the Defendants if he had lived.
- 57. The decedent's right of action for wrongful and negligent conduct against the Defendants survive in favor of heirs, legal representatives, and the estate of the deceased.
- 58. Defendants are liable to Plaintiffs for the loss of Brook's life, pain and suffering, and the violation of his civil rights. Plaintiffs seek compensation as set forth more specifically in the section of this Complaint entitled "Damages."

XI.

WRONGFUL DEATH

- 59. Plaintiffs incorporate by reference paragraphs 1 though 55 as it fully sets forth herein.

60. By reason of Defendants wrongful conduct, Brook's death was a producing cause of injury, which resulted in the following damages: loss of a family relationship, love, support, services, emotional pain and suffering, and for their acts and infliction of emotional distress.

61. Plaintiffs seek compensation as set forth more specifically in the damages section.

XII.

JOINT AND SEVERAL LIABILITY

62. Plaintiffs incorporate by reference paragraphs 1 through 61 as if fully set forth herein. Plaintiff would should that the Defendants were jointly and severally liable for the gross negligence, which was the proximate cause of Plaintiff's injuries.

XIII.

DAMAGES

63. Defendants' acts and/or omissions were a proximate cause of the following injuries suffered by Plaintiff and decedent;

- a. Actual damages;
- b. Loss of affection, consortium, comfort, financial assistance, protection, affection and care;
- c. Pain and suffering and mental anguish suffered by Mr. Brooks prior to his death;
- d. Mental anguish and emotional distress suffered by Plaintiffs;
- e. Loss of quality of life;
- f. Funeral and burial expenses;
- g. Loss of service;
- h. Loss of earnings and contributions to Plaintiffs;
- i. Punitive damages as well as costs of court;

- j. Pursuant to all applicable laws, Plaintiff should be awarded reasonable attorney's fees for the preparation and trial of this cause of action, and for its appeal, if required;
 - k. Prejudgment interest; and
 - l. Post judgment interest
64. Plaintiff seeks unliquidated damages in an amount that is within the jurisdictional limits of the court.
65. Plaintiff requests all audio visual equipment to monitor all inmate activity during the confinement of Mr. Brooks's incarceration.

XIV.

REQUEST FOR JURY TRIAL

66. Plaintiffs hereby requests a jury trial. A jury fee has been and/or will be paid in this matter.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiffs RAYMOND BROOKS, INDIVIDUALLY AND AS REPRESENTATIVE OF THE ESTATE OF ROBERT BROOKS, DECEASED, GERALDINE BROOKS, NA'TOSHA ROBINSON, ASHLEY JOHNSON, CRYSTAL BROOKS, TIARA BROOKS, CIARA BROOKS, ROBNEISHA BROOKS, BRIANNA BROOKS, MICHAEL BROOKS, AND ARLENE BROOKS pray that the Defendants be cited to appear and answer herein and that upon final hearing they have judgment against Defendants for actual and punitive damages, for prejudgment and post-judgment interest at the legal rate, costs of court; and such other and further relief to which the Plaintiffs may be entitled at law or in equity.

Respectfully submitted,

Law Office of Lanease D. Fuller

By: /s/ Lanease D. Fuller

Lanease D. Fuller

Texas Bar No. 07522750

Email: attyfuller@gmail.com

4615 Southwest Freeway

Suite 820

HOUSTON, TX 77027

Tel. (713) 439-7400

Fax. (713) 439-7471

Attorney for Plaintiffs

RAYMOND BROOKS, INDIVIDUALLY
AND AS REPRESENTATIVE OF THE
ESTATE OF ROBERT BROOKS,
DECEASED, GERALDINE BROOKS,
NA'TOSHA ROBINSON, ASHLEY
JOHNSON, CRYSTAL BROOKS, TIARA
BROOKS, CIARA BROOKS, ROBNEISHA
BROOKS, BRIANNA BROOKS, MICHAEL
BROOKS, AND ARLENE BROOKS



I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this July 9, 2017

Certified Document Number: 75481986 Total Pages: 11

Chris Daniel, DISTRICT CLERK
HARRIS COUNTY, TEXAS

In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail support@hcdistrictclerk.com

CIVIL CASE INFORMATION SHEET (REV. 2/13)

6/12/2017 8:20:36 PM
Chris Daniel - District Clerk
Harris County

CAUSE NUMBER (FOR CLERK USE ONLY):

COURT (FOR CLERK USE ONLY):

Envelope No: 17572481

By: CUERO, NELSON

Filed: 6/12/2017 8:20:36 PM

STYLED Raymond L. Brooks, III Ind. and as Representative of the Estate of Robert L. Brooks, III Ind. and as Representative of the Estate of George Jackson, et al

(e.g., John Smith v. All American Insurance Co; In re Mary Ann Jones; In the Matter of the Estate of George Jackson)

A civil case information sheet must be completed and submitted when an original petition or application is filed to initiate a new civil, family law, probate, or mental health case or when a post-judgment petition for modification or motion for enforcement is filed in a family law case. The information should be the best available at the time of filing.

1. Contact information for person completing case information sheet: Name: Lanease D. Fuller Email: Attyfuller@gmail.com Address: 4615 SW Frwy #820 Telephone: 713-439-7400 City/State/Zip: Houston, TX 77027 Fax: 713-439-7471 Signature: /s/ Lanease D. Fuller State Bar No: 07522750		Names of parties in case: Plaintiff(s)/Petitioner(s): Raymond L. Brooks III, et al Defendant(s)/Respondent(s): Harris County Sheriff, et al [Attach additional page as necessary to list all parties]		Person or entity completing sheet is: <input checked="" type="checkbox"/> Attorney for Plaintiff/Petitioner <input type="checkbox"/> Pro Se Plaintiff/Petitioner <input type="checkbox"/> Title IV-D Agency <input type="checkbox"/> Other: Additional Parties in Child Support Case: Custodial Parent: Non-Custodial Parent: Presumed Father:	
2. Indicate case type, or identify the most important issue in the case (select only 1):					
Civil			Family Law		
Contract <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Consumer/DTPA <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Fraud/Misrepresentation <input type="checkbox"/> Other Debt/Contract: Foreclosure <input type="checkbox"/> Home Equity—Expedited <input type="checkbox"/> Other Foreclosure <input type="checkbox"/> Franchise <input type="checkbox"/> Insurance <input type="checkbox"/> Landlord/Tenant <input type="checkbox"/> Non-Competition <input type="checkbox"/> Partnership <input type="checkbox"/> Other Contract:	Injury or Damage <input type="checkbox"/> Assault/Battery <input type="checkbox"/> Construction <input type="checkbox"/> Defamation <input type="checkbox"/> Malpractice <input type="checkbox"/> Accounting <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional Liability: <input type="checkbox"/> Motor Vehicle Accident <input type="checkbox"/> Premises <input type="checkbox"/> Product Liability <input type="checkbox"/> Asbestos/Silica <input type="checkbox"/> Other Product Liability List Product: <input checked="" type="checkbox"/> Other Injury or Damage:	Real Property <input type="checkbox"/> Eminent Domain/Condemnation <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Trespass to Try Title <input type="checkbox"/> Other Property: Related to Criminal Matters <input type="checkbox"/> Expunction <input type="checkbox"/> Judgment Nisi <input type="checkbox"/> Non-Disclosure <input type="checkbox"/> Seizure/Forfeiture <input type="checkbox"/> Writ of Habeas Corpus—Pre-indictment <input type="checkbox"/> Other:	Marriage Relationship <input type="checkbox"/> Annulment <input type="checkbox"/> Declare Marriage Void Divorce <input type="checkbox"/> With Children <input type="checkbox"/> No Children Other Family Law <input type="checkbox"/> Enforce Foreign Judgment <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Name Change <input type="checkbox"/> Protective Order <input type="checkbox"/> Removal of Disabilities of Minority <input type="checkbox"/> Other:	Post-judgment Actions (non-Title IV-D) <input type="checkbox"/> Enforcement <input type="checkbox"/> Modification—Custody <input type="checkbox"/> Modification—Other Title IV-D <input type="checkbox"/> Enforcement/Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Reciprocals (UIFSA) <input type="checkbox"/> Support Order Parent-Child Relationship <input type="checkbox"/> Adoption/Adoption with Termination <input type="checkbox"/> Child Protection <input type="checkbox"/> Child Support <input type="checkbox"/> Custody or Visitation <input type="checkbox"/> Gestational Parenting <input type="checkbox"/> Grandparent Access <input type="checkbox"/> Parentage/Paternity <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> Other Parent-Child:	
Employment <input type="checkbox"/> Discrimination <input type="checkbox"/> Retaliation <input type="checkbox"/> Termination <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Other Employment:	Other Civil <input type="checkbox"/> Administrative Appeal <input type="checkbox"/> Antitrust/Unfair Competition <input type="checkbox"/> Code Violations <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Intellectual Property <input type="checkbox"/> Lawyer Discipline <input type="checkbox"/> Perpetuate Testimony <input type="checkbox"/> Securities/Stock <input type="checkbox"/> Tortious Interference <input type="checkbox"/> Other:				
Tax <input type="checkbox"/> Tax Appraisal <input type="checkbox"/> Tax Delinquency <input type="checkbox"/> Other Tax	Probate & Mental Health Probate/Wills/Intestate Administration <input type="checkbox"/> Dependent Administration <input type="checkbox"/> Independent Administration <input type="checkbox"/> Other Estate Proceedings <input type="checkbox"/> Guardianship—Adult <input type="checkbox"/> Guardianship—Minor <input type="checkbox"/> Mental Health <input type="checkbox"/> Other:				
3. Indicate procedure or remedy, if applicable (may select more than 1):					
<input type="checkbox"/> Appeal from Municipal or Justice Court <input type="checkbox"/> Arbitration-related <input type="checkbox"/> Attachment <input type="checkbox"/> Bill of Review <input type="checkbox"/> Certiorari <input type="checkbox"/> Class Action		<input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Interpleader <input type="checkbox"/> License <input type="checkbox"/> Mandamus <input type="checkbox"/> Post-judgment		<input type="checkbox"/> Prejudgment Remedy <input type="checkbox"/> Protective Order <input type="checkbox"/> Receiver <input type="checkbox"/> Sequestration <input type="checkbox"/> Temporary Restraining Order/Injunction <input type="checkbox"/> Turnover	
4. Indicate damages sought (do not select if it is a family law case):					
<input type="checkbox"/> Less than \$100,000, including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorney fees <input type="checkbox"/> Less than \$100,000 and non-monetary relief <input type="checkbox"/> Over \$100,000 but not more than \$200,000 <input type="checkbox"/> Over \$200,000 but not more than \$1,000,000 <input checked="" type="checkbox"/> Over \$1,000,000					

Instructions for Completing the Texas Civil Case Information Sheet

A civil case information sheet must be completed and submitted when an original petition or application is filed to initiate a new civil, family law, probate, or mental health case or when a post-judgment petition for modification or motion for enforcement is filed in a family law case. The information should be the best available at the time of filing. If the original petition, application or post-judgment petition or motion is e-filed, the case information sheet must not be the lead document.

This sheet, required by Rule 78a of the Texas Rules of Civil Procedure, is intended to collect information that will be used for statistical and administrative purposes only. It neither replaces nor supplements the filings or service of pleading or other documents as required by law or rule. The sheet does not constitute a discovery request, response, or supplementation, and it is not admissible at trial.

The attorney or self-represented (*pro se*) plaintiff/petitioner filing the case or post-judgment petition or motion should complete the sheet as follows:

1. Contact information

a) Contact information for person completing case information sheet. Enter the following information:

- name;
- address;
- city, state, and zip code;
- email address;
- telephone number;
- fax number, if available;
- State Bar number, if the person is an attorney; and
- signature. (*NOTE: When a case information sheet is submitted electronically, the signature may be a scanned image or "/s/" and the name of the person completing the case information sheet typed in the space where the signature would otherwise appear.*)

b) Names of parties in the case. Enter the name(s) of the:

(*NOTE: If the name of a party to a case is confidential, enter the party's initials rather than the party's name.*)

- plaintiff(s) or petitioner(s);
- defendant(s) or respondent(s); and
- in child support cases, additional parties in the case, including the:
 - custodial parent;
 - non-custodial parent; and
 - presumed father.

Attach an additional page as necessary to list all parties.

c) Person or entity completing sheet is. Indicate whether the person completing the sheet, or the entity for which the sheet is being completed, is:

- an attorney for the plaintiff or petitioner;
- a *pro se* (self-represented) plaintiff or petitioner;
- the Title IV-D agency; or
- other (provide name of person or entity).

2. Case type.

Select the case category that best reflects the most important issue in the case. *You must select only one.*

3. Procedure or remedy.

If applicable, select any of the available procedures or remedies being sought in the case. You may select more than one.

4. Damages sought.

Select the damages being sought in the case:

(*NOTE: If the claim is governed by the Family Code, do **not** indicate the damages sought.*)

- only monetary relief of \$100,000 or less, including damages of any kind, penalties, costs, expenses, pre-judgment interest and attorney fees;
- monetary relief over \$100,000 or less and non-monetary relief;
- monetary relief over \$100,000 but not more than \$200,000;
- monetary relief over \$200,000 but less than \$1,000,000; or
- monetary relief over \$1,000,000.



I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.
Witness my official hand and seal of office
this July 9, 2017

Certified Document Number: 75481987 Total Pages: 2

Chris Daniel, DISTRICT CLERK
HARRIS COUNTY, TEXAS

In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail support@hcdistrictclerk.com

Lanease D. Fuller

Attorney and Counselor at Law

4615 Southwest Frwy., Ste. 820
Houston, Texas 77027
(713) 439-7400 Office
(713) 439-7471 Facsimile
lfuler@aol.com

June 13, 2017

Harris County District Clerk
201 Caroline
Houston, Texas 77002

Re: Cause No. 2017-39278; *Raymond Brooks, Individually and as Representative of the Estate of Robert Brooks, Deceased, Geraldine Brooks, Na'Tosha Robinson, Ashley Johnson, Crystal Brooks, Tiara Brooks, Ciara Brooks and Robneisha Brooks and Brianna Brooks, Michael Brooks and Arlene Brooks*; In the 165th Judicial District Court; Harris County, Texas.

Dear Sir or Madam:

Enclosed please find the following additional fees for the previously filed Petition for the above-referenced case:

- \$2.75 to cover the cost of additional copies for service. Fees for 1 copy of Petition totaling 11 pages has been paid. Two (2) Citations should be issued and fees are included to serve the following Defendants:
 1. Harris County Sheriff's Department
c/o The Honorable Ed Emmett
1001 Preston, Suite 911
Houston, Texas 77002
 2. Ron Hickman
1200 Baker Street
Houston, Texas 77002

Please notify Don Caspry, Process Server, Box 180, 832-274-3887 once the citations are ready for Pick-up.

- \$25.00 to cover the cost of additional Plaintiffs 11-25 when filing new case.

Very truly yours,

By: /S/Lanease Fuller
Lanease D. Fuller

LDF/cdb



I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.
Witness my official hand and seal of office
this July 9, 2017

Certified Document Number: 75496027 Total Pages: 2

Chris Daniel, DISTRICT CLERK
HARRIS COUNTY, TEXAS

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CHRIS DANIEL
HARRIS COUNTY DISTRICT CLERK

ENTERED _____
VERIFIED 10

Civil Process Pick-Up Form

CAUSE NUMBER: 2017-39278

ATY _____ CIV ✓ COURT 165

REQUESTING ATTORNEY/FIRM NOTIFICATION

ATTORNEY: Fuller, Lanease D. PH: _____

CIVIL PROCESS SERVER: Don Caspry Box 180

PH: 832-274-3887

PERSON NOTIFIED SVC READY: Mr. Don Caspry

DATE: a Perez

Type of Service Document: Cit
Type of Service Document: Cit
Type of Service Document: _____
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Tracking Number 73386318
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Tracking Number _____
Tracking Number _____

Process papers prepared by: **ANITA PEREZ**

Date: 6-21- 2017 30 days waiting _____ - _____ - _____

Process papers released to: _____

Don Caspry
(PRINT NAME)

832-571-3887
(CONTACT NUMBER)

Don Caspry
(SIGNATURE)

Process papers released by: _____

STH
(PRINT NAME)

STH
(SIGNATURE)

Date: 6/30, 2017 Time: 0800 AM / PM



I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.

Witness my official hand and seal of office this July 9, 2017

Certified Document Number: 75772336 Total Pages: 1

Chris Daniel, DISTRICT CLERK
HARRIS COUNTY, TEXAS

In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail support@hcdistrictclerk.com

CAUSE NO. 201739278

RECEIPT NO. 0.00 CIV

TR # 73386933

PLAINTIFF: BROOKS, RAYMOND L (III) (INDIVIDUALLY AND AS
REPRESENTATIVE OF THE
vs.
DEFENDANT: HARRIS COUNTY SHERIFF'S DEPARTMENT

In The 165th
Judicial District Court
of Harris County, Texas
165TH DISTRICT COURT
Houston, TX

CITATION

THE STATE OF TEXAS
County of Harris

TO: HARRIS COUNTY SHERIFF'S DEPARTMENT MAY BE SERVED BY AND THROUGH THE
COUNTY JUDGE THE HONORABLE ED EMMETT
1001 PRESTON SUITE 911 HOUSTON TX 77002

Attached is a copy of PLAINTIFF'S ORIGINAL PETITION REQUEST FOR DISCLOSURE AND REQUEST FOR JURY TRIAL

This instrument was filed on the 12th day of June, 2017, in the above cited cause number and court. The instrument attached describes the claim against you.

YOU HAVE BEEN SUED, You may employ an attorney. If you or your attorney do not file a written answer with the District Clerk who issued this citation by 10:00 a.m on the Monday next following the expiration of 20 days after you were served this citation and petition, a default judgment may be taken against you.

TO OFFICER SERVING:

This citation was issued on 21st day of June, 2017, under my hand and seal of said Court.

Issued at request of:
DICKENS-FULLER, LANEASE
4615 SOUTHWEST FREEWAY SUITE
820
HOUSTON, TX 77027
Tel: (713) 439-7400
Bar No.: 7522750



Chris Daniel

CHRIS DANIEL, District Clerk
Harris County, Texas
201 Caroline, Houston, Texas 77002
(P.O. Box 4651, Houston, Texas 77210)

Generated By: PEREZ, ANITA IOJ//10710929

OFFICER/AUTHORIZED PERSON RETURN

Came to hand at 0900 o'clock 7.M., on the 30 day of JUNE, 2017.

Executed at (address) _____ in
_____ County at 1200 o'clock 7.M., on the 30 day of JUNE,
2017, by delivering to _____ defendant, in person, a

true copy of this Citation together with the accompanying _____ copy(ies) of the Petition
attached thereto and I endorsed on said copy of the Citation the date of delivery.
To certify which I affix my hand officially this _____ day of _____, _____.

FEE: \$ _____
_____ of _____ County, Texas

By _____
Affiant Deputy

On this day, _____, known to me to be the person whose
signature appears on the foregoing return, personally appeared. After being by me duly sworn,
he/she stated that this citation was executed by him/her in the exact manner recited on the
return.

SWORN TO AND SUBSCRIBED BEFORE ME, on this _____ day of _____, _____.

Notary Public

RETURN OF SERVICE

BROOKS, RAYMOND L (III) (INDIVIDUALLY AND AS REPRESENTATIVE OF THE

Plaintiff

VS.

HARRIS COUNTY SHERIFF'S DEPARTMENT

Defendant

CAME TO HAND ON: 6/30/17 AT 8:10 AM

BY DELIVERING TO: HARRIS COUNTY SHERIFF'S DEPARTMENT MAY BE SERVED BY
AND THROUGH THE COUNTY JUDGE THE HONORABLE ED EMMET ACCEPTED BY
DOUG ADKINSON CRIMINAL JUSTICE ADVISOR

ADDRESS DELIVERED: 1001 PRESTON SUITE 911 HOUSTON TX 77002

DATE EXECUTED: 6/30/17 AT 11:59 AM

MODE OF DELIVERY: IN PERSON

DOCUMENT DELIVERED: CITATION PLAINTIFF'S ORIGINAL PETITION REQUEST FOR
DISCLOSURE AND REQUEST FOR JURY TRIAL

A true and correct copy of the above listed documents were delivered having first endorsed on such copy the date of delivery.

I am over the age of eighteen, neither a party to nor interested in the outcome of the above numbered suit and am authorized by written order of the court to serve citation and other notices.

Service Fee: \$85.00

Witness Fee: _____

Don Court Caspary

Don Court Caspary SCH000004789 Expires 03/31/18

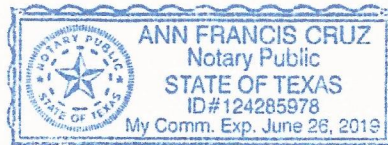
5507 Cheltenham Dr, Houston, TX 77096-3005

VERIFICATION

State of Texas

Before me, a notary public, on this day personally appeared the above named authorized person known to me to be the person whose name is subscribed to the foregoing document and, being by me first duly sworn, declared that the statements therein contained are true and correct. Given my hand and seal of office on this 5th day of

July, 2017.
Ann F. Cruz





I, Chris Daniel, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.
Witness my official hand and seal of office
this July 9, 2017

Certified Document Number: 75785121 Total Pages: 2

Chris Daniel, DISTRICT CLERK
HARRIS COUNTY, TEXAS

In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail support@hcdistrictclerk.com